## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOHN DOES 1 THROUGH 7,

Plaintiffs,

v.

Misc Action No. 1:20-mc-00740-KPF

THE TALIBAN, AL-QAEDA, and THE HAQQANI NETWORK,

Defendants.

PLAINTIFFS' MOTION FOR NUNC PRO TUNC ISSUANCE AND SERVICE OF WRIT

Plaintiffs, John Does 1 through 7, through undersigned counsel, hereby respectfully request an Order granting the Writ of Execution against the assets of the Taliban, including the blocked assets of Da Afghanistan Bank held at the Federal Reserve Bank of New York *nunc pro tunc* to the petition date and the service date *nunc pro tunc* to the day after the writ was initially applied for, and in support thereof state:

- 1. On August 26, 2021, Plaintiffs filed an Emergency Motion for Writ of Execution against the assets of the Taliban, including the blocked assets of Da Afghanistan Bank held at the Federal Reserve Bank of New York and other financial institutions. DE 15.
- 2. On August 30, 2021, the Court granted the government's motion to stay the proceedings until today's date so that the government could determine whether it would file a statement of interest. DE 19.
- 3. On September 23, 2021, this Court did permit service of the Plaintiffs' Writ of Execution on the Federal Reserve Bank of New York. DE 26.
  - 4. That writ was duly served on September 27, 2021.

5. Plaintiffs respectfully request that the Court grant the Writ of Execution *nunc pro tunc* to the petition date, August 26, 2021 and the service date on their Writ of Execution be dated *nunc pro tunc* to the day after the writ was initially applied for by Plaintiffs, *i.e.*, August 27, 2021.

**WHEREFORE**, Plaintiffs respectfully request that their Writ of Execution against the Federal Reserve Bank of New York be dated *nunc pro tunc* to August 26, 2021 and service of process be dated *nunc pro tunc* to August 27, 2021.

Respectfully submitted,

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By: s/ Orlando do Campo Orlando do Campo Bar Code: OD1969 od@dandtlaw.com

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 14, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

<u>s/ Orlando do Campo</u> Orlando do Campo